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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL MOE,

Defendant.

Case No. 2:20-cr-00230-KJD-DJA

**Joint Stipulation to Continue Deadline
for Government to Respond to Early
Termination Motion [ECF NO. 55]**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.

Frierson, Acting United States Attorney, and Edward G. veronda, Assistant United States Attorney, counsel for the United States of America, and Heidi Ojeda, counsel for MICHAEL MOE, that the deadline for the Government to respond to MOE's Motion for Early Termination of Supervised Release (ECF No. 55) be extended for at least 4 weeks.

This Stipulation is entered into for the following reasons:

1. USPO Officer Warner informed the Government that Michael Moe conducted a drug test after the filing of the early termination motion. USPO Officer Warner also stated it would take several weeks before the results of the drug test were returned from the laboratory. The Government would prefer to know the results of the drug test before filing any opposition/non-opposition to the early termination motion.

3. MICHAEL MOE agrees with the need for the continuance.

4. The parties agree to the continuance.

This is the first request to extend the deadline to respond.

DATED this 16th day of February, 2024.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Heidi Ojeda

HEIDI OJEDA

Assistant Federal Public Defender
Counsel for Defendant MOE

/s/ Edward G. Veronda

EDWARD G. VERONDA

Assistant United States Attorney

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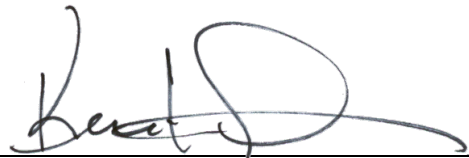
Case No. 2:20-cr-00230-KJD-DJA

ORDER

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the Government's Deadline to Respond to Defendant's Motion for Early Termination be extended to March 22nd, 2024

DATED this 16th day of February, 2024.



HONORABLE KENT J. DAWSON
UNITED STATES DISTRICT JUDGE